

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

MEDLINE INDUSTRIES, LP

Plaintiff,

v.

C.R. BARD, INC.

Defendant.

Civil Action No. 1:14-cv-03618

The Honorable John Z. Lee

**DECLARATION OF COURTNEY E. CRONIN IN SUPPORT OF  
MEDLINE'S MOTION FOR SANCTIONS**

I, Courtney E. Cronin, hereby declare as follows:

1. I am a managing associate at the law firm of Sidley Austin LLP and counsel for Medline Industries, LP (“Medline”). I have personal knowledge of the facts set forth in this declaration and, if called upon as a witness, I could and would testify to such facts under oath.

2. Attached as Exhibit 1 is a true and correct copy of a Survey produced by Bard as Bates number BARD\_0500722-801.

3. Attached as Exhibit 2 is a true and correct copy of excerpts from Bard’s Third Supplemental Responses to Medline Industries, Inc.’s First Set of Requests for the Production of Documents, served November 23, 2015.

4. Attached as Exhibit 3 is a true and correct copy of a Study Report dated June 2, 2016, produced by Bard as Bates number Bard\_1085100-19.

5. Attached as Exhibit 4 is a true and correct copy of excerpts from the Expert Report of Dr. Edward Yun Related to Invalidity, served June 14, 2019.

6. Attached as Exhibit 5 is a true and correct copy of excerpts from the Expert Report of Dr. Edward Yun Related to Damages, Non-Infringement, and New Evidence of Alleged Secondary Considerations, served July 25, 2019.

7. Attached as Exhibit 6 is a true and correct copy of excerpts from the Rebuttal Expert Report of Richard Hillstead, Ph.D., Regarding Non-Infringement of Asserted Claims of U.S. Patent Nos. 8,448,786 and 8,678,190, served July 25, 2019.

8. Attached as Exhibit 7 is a true and correct copy of excerpts from the Expert Report of Raymond S. Sims, served July 25, 2019.

9. Attached as Exhibit 8 is a true and correct copy of excerpts from the transcript of the deposition of Dr. Edward Yun, dated August 22, 2019.

10. Attached as Exhibit 9 is a true and correct copy of excerpts from the transcript of the deposition of Richard Hillstead, Ph.D., dated August 20, 2019.

11. Attached as Exhibit 10 is a true and correct copy of a letter from Nathaniel Love to Marc Kaplan dated July 25, 2022.

12. Attached as Exhibit 11 is a true and correct copy of a letter from Marc Kaplan to Nathaniel Love dated July 31, 2022.

13. Attached as Exhibit 12 is a true and correct copy of excerpts from C.R. Bard, Inc.'s Responses and Supplemental Responses to Medline Industries, Inc.'s Interrogatories (Nos. 1-24), served May 31, 2019.

14. Attached as Exhibit 13 is a true and correct copy of excerpts from the Joint Proposed Jury Instructions.

15. Attached as Exhibit 14 is a true and correct copy of a July 25, 2022 to August 5, 2022 email chain of correspondence between counsel for Medline and counsel for Bard,

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on August 5, 2022, in Chicago, Illinois.

/s/ Courtney E. Cronin